Case 1:06-cv-00669-RJH Document 21 Filed 09/22/2006 Page 1 of 3

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In Re "A Million Little Pieces Litigation"

MDL Docket No. 1771

THIS DOCUMENT RELATES TO ALL ACTIONS

"A MILLION LITTLE PIECES" PLAINTIFFS' GROUP'S NOTICE OF MOTION FOR CONSOLIDATION AND APPOINTMENT OF CO-INTERIM CLASS COUNSEL

PLEASE TAKE NOTICE that Plaintiffs Marcia Vedral, Michele Snow, Diane Marolda, Sara Brackenrich, Jimmy Floyd, Jill Giles, Pilar More, Stuart Oswald, Shera Paglinawan, and Ann Marie Strack (hereinafter "AMLP Plaintiffs' Group," "Movant" or collectively "Plaintiffs") by and through their counsel, will hereby move this Court, on a date and at such time as may be designated by the Court, for an Order (attached hereto as Exhibit A): (i) consolidating for all purposes the above-captioned related actions pursuant to F.R.C.P. 42(a); (ii) approving Movant's selection of the law firm of Brodsky & Smith, LLC and Larry D. Drury, Ltd. to serve as Co-Interim Class Counsel pursuant to F.R.C.P. 23(g); and (iii) granting such other and further relief as the Court may deem just and proper. In support of this motion, Movant submits herewith a Memorandum of Law,

Doc. 21

Declaration of Evan J. Smith, Esquire and Scott Frost, Esquire.

Dated: September 22, 2006 Respectfully submitted,

LAW OFFICES OF THOMAS M. MULLANEY

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